

REMARKS

The present application was filed on February 16, 2001 with claims 1 through 30, of which claim 1 is an independent claim. The present application claims the benefit of provisional patent application 60/183,182, filed on February 17, 2000. With
 5 the present response, Applicants propose to amend claims 1 through 30 and add claim 31. The amendments to claims 1-30 and new claim 31 are supported by claims 1 through 5, as originally filed.

In the outstanding Office Action, the Examiner rejected claims 1-11, 14-19, and 24-30 under 35 USC §102(e) as being anticipated by Spiegel et al. (U.S. Patent
 10 No. 6,466,918, hereinafter, Spiegel), and rejected claims 12, 13, and 20-23 under 35 USC §103(a) as being unpatentable over Spiegel in view of Tesler (U.S. Patent No. 6,111,578, hereinafter, Tesler).

Changes to the Specification

15 Applicants have amended the specification at page 11 to update serial numbers for two related applications. Additionally, a portion of the updated paragraph on page 11 has been copied to the Cross-References and Priority Documents section of the specification.

Rejection to Independent Claim 1 Under 35 USC §102(e)

20 The Examiner rejected independent claim 1 under 35 USC §102(e) as being anticipated by Spiegel. The Examiner cited the following sections of Spiegel when rejecting independent claim 1: col. 1, line 35 to col. 2, line 5; col. 4, line 53 to col. 5, line 10; and col. 8, lines 33-60.

25 Independent claim 1 comprises the following limitations: A computer graphical user interface (GUI) displayed on a computer, the GUI further comprising: two or more visual categories, each of the visual categories divided into visual subcategories of ordered levels of specificity, each of the ordered levels of specificity grouped into visual districts containing visual subcategories of the same levels of specificity, where the
 30 visual districts are represented as shapes.

Applicants read the cited text of Spiegel as describing, among other things, a “browse tree,” as shown in FIG. 1B of Spiegel. Applicants respectfully submit that Spiegel never discloses or implies that the browse tree is displayed on a computer, and in independent claim 1, Applicants claim a GUI displayed on a computer, the GUI comprising elements including those in the limitations recited above. Nonetheless,
5 strictly for the sake of argument, Applicants will assume that the browse tree of FIG. 1B of Spiegel is displayed on a computer system.

Applicants respectfully submit that Spiegel does not disclose or imply several limitations of independent claim 1. For example, in amended independent claim
10 1, Applicants claim visual districts that are represented as shapes, where the visual districts contain visual subcategories of the same levels of specificity. In Spiegel, there is no “shape” that contains visual subcategories of the same level of specificity. For instance, FIG. 1B of Spiegel shows a number of circles corresponding to categories or items. See col. 8, lines 33-43 of Spiegel. The circles do not contain visual subcategories
15 of the same level of specificity. For the sake of argument, the tree shown in FIG. 1B of Spiegel might be considered to be a “shape.” Even if this is true, the shape does not contain visual subcategories of the same level of specificity, as (if there are levels of specificity in the tree of Spiegel at all) there are multiple levels of specificity in the tree of Spiegel.

20 Thus, there are no visual districts that are represented as shapes, where the visual districts contain visual subcategories of the same levels of specificity, as claimed by Applicants in amended independent claim 1.

As another example, Applicants also respectfully submit that FIG. 1A of Spiegel does not disclose or imply “each of the visual categories divided into visual
25 subcategories of ordered levels of specificity,” as the links 130 under the “Sports & Outdoors” branch (e.g., or the links 110 under the “Featured Categories” branch) are not divided into ordered levels of specificity, as this term is defined in Applicants’ claim and specification. See, for example, in FIG. 3A of Applicants’ specification, at page 17, lines 3-19, and FIG. 3D, where an internal catalog structure represented as a tree is mapped
30 into ordered levels of specificity, and where the ordered levels of specificity are grouped into visual districts represented by concentric rings. An exemplary mapping in the cited

text of Applicants' specification maps leaf nodes of the tree into inner rings and maps all non-leaf nodes that are not parents of a leaf node into the outer-most ring, where the inner rings are more specific and the outer rings are less specific.

Consequently, Applicants respectfully submit that independent claim 1 is
5 patentable over Spiegel, and Applicants request the §102(e) rejection of independent claim 1 be withdrawn.

Rejections to Dependent Claims 2-30

In the outstanding Office Action, the Examiner rejected dependent claims
10 2-11, 14-19, and 24-30 under 35 USC §102(e) as being anticipated by Spiegel and rejected dependent claims 12, 13, and 20-23 under 35 USC §103(a) as being unpatentable over Spiegel in view of Tesler. Applicants also submit that independent claim 1 is patentable over Tesler, alone or in combination with Spiegel, as Tesler does not disclose or imply at least the limitation in independent claim 1 of each of the ordered levels of
15 specificity grouped into visual districts containing visual subcategories of the same levels of specificity, where the visual districts are represented as shapes. Because independent claim 1 is patentable, dependent claims 2-30, which include all limitations of independent claim 1, are also patentable.

Furthermore, dependent claim 3 adds the limitation of "where the visual
20 districts are represented as concentric shapes." Exemplary concentric shapes for visual districts are shown in, for instance, FIGS. 3A-3D of Applicants' specification. The term "concentric" is defined as "having a common center" by Random House Webster's College Dictionary (1997). Applicants respectfully submit that none of the cited art discloses or implies visual districts that are represented as concentric shapes, as claimed
25 in dependent claim 3. Consequently, dependent claim 3 is patentable over the cited art, regardless of the patentability of independent claim 1.

Conclusion

All of the pending claims, i.e., claims 1-30, are in condition for allowance
30 and such favorable action is earnestly solicited. If any outstanding issues remain, or if

the Examiner has any further suggestions for expediting allowance of this application, the Examiner is invited to contact the undersigned at the telephone number indicated below.

The Examiner's attention to this matter is appreciated.

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Respectfully submitted,

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